

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

William A. Levin (SBN 98592)
Laurel L. Simes (SBN 134637)
David M. Grimes (SBN 324292)
Samira J. Bokaie (SBN 332782)
LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
Telephone: (415) 426-3000
Facsimile: (415) 426-3001
Email: wlevin@levinsimes.com
Email: lsimes@levinsimes.com
Email: dgrimes@levinsimes.com
Email: sbokaie@levinsimes.com

Attorneys for Levin Simes Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM A. LEVIN
IN SUPPORT OF LEVIN SIMES
PLAINTIFFS' OPPOSITION TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS LEVIN
SIMES CASES FOR FAILURE TO
COMPLY WITH DISCOVERY ORDERS**

This Document Relates to:

Jane Doe LS 90 v. Uber Technologies, Inc., et
al., No. 3:23-cv- 03956-CRB

Jane Doe LS 250 v. Uber Technologies, Inc., et
al., No. 3:23-cv- 03995-CRB

Jane Doe LS 383 v. Uber Technologies, Inc., et
al., No. 3:23-cv- 05197-CRB

Jane Doe LS 107 v. Uber Technologies, Inc., et
al., No. 3:23-cv- 05232-CRB

Jane Doe LS 353 v. Uber Technologies,
Inc., et al., No. 3:23-cv- 05401-CRB

Jane Doe LS 285 v. Uber Technologies,
Inc., et al., No. 3:23-cv- 05919-CRB

Jane Doe LS 330 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05160-CRB

Judge: Honorable Charles R. Breyer
Date: July 11, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

1 Jane Doe LS 419 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05263-CRB
 2
 3 Jane Doe LS 412 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05317-CRB
 4
 5 Jane Doe LS 492 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05324-CRB
 6
 7 Jane Doe LS 338 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05326-CRB
 8
 9 Jane Doe LS 252 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05334-CRB
 10
 11 Jane Doe LS 225 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05336-CRB
 12
 13 Jane Doe LS 131 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05337-CRB
 14
 15 Jane Doe LS 128 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05377-CRB
 16
 17 Jane Doe LS 281 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05430-CRB
 18
 19 Jane Doe LS 507 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05509-CRB
 20
 21 Jane Doe LS 500 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05513-CRB
 22
 23 Jane Doe LS 101 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05521-CRB
 24
 25 Jane Doe LS 506 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05531-CRB
 26
 27 Jane Doe LS 473 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05544-CRB
 28
 29 Jane Doe LS 47 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05571-CRB
 30
 31 Jane Doe LS 482 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05593-CRB
 32
 33 Jane Doe LS 476 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05646-CRB
 34
 35 Jane Doe LS 467 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05652-CRB

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 509 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05662-CRB

Jane Doe LS 449 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05689-CRB

Jane Doe LS 435 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05755-CRB

Jane Doe LS 452 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05756-CRB

Jane Doe LS 422 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05758-CRB

Jane Doe LS 519 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05759-CRB

Jane Doe LS 429 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05797-CRB

Jane Doe LS 434 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05814-CRB

Jane Doe LS 417 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05821-CRB

Jane Doe LS 469 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05874-CRB

Jane Doe LS 289 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05883-CRB

Jane Doe LS 366 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05886-CRB

Jane Doe LS 355 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05887-CRB

Jane Doe LS 300 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05900-CRB

Jane Doe LS 267 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05901-CRB

Jane Doe LS 173 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05907-CRB

Jane Doe LS 169 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05918-CRB

Jane Doe LS 324 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05920-CRB

Jane Doe LS 124 v. Uber Technologies,
 Inc., et al., No. 3:24-cv- 05930-CRB

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 132 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05934-CRB

Jane Doe LS 45 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05935-CRB
Jane Doe LS 243 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05939-CRB

Jane Doe LS 192 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05975-CRB

Jane Doe LS 5 v. Uber Technologies,
Inc., et al., No. 3:24-cv-05976-CRB

Jane Doe LS 288 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05987-CRB

Jane Doe LS 160 v. Uber Technologies,
Inc., et al., No. 3:24-cv- 05996-CRB

Jane Doe LS 327 v. Uber Technologies, Inc., et
al., No. 3:24-cv- 06032-CRB

I, William A. Levin declare as follows:

1. I am an attorney who is duly licensed to practice law before all courts of the State of California. I am a partner the law firm Levin Simes LLP, and counsel of record for all Jane Doe LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

2. This declaration is made in support of Levin Simes Plaintiffs' Opposition to Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Levin Simes Cases for Failure to Comply with Discovery Orders.

3. Since this issue was raised in late December 2024, our firm has been able to cure

4. over seventy percent of the fact sheet deficiencies, and we expect we will continue to cure them.

5. Our firm's efforts to reach the Plaintiff subject to Uber's motion include numerous phone calls, emails, texts, written letters, and address searches. We also employed investigators to trace new contact information for these individuals.

6. Uber identifies 52 Plaintiffs, however in the time between Uber's filing of its moving papers and the filing of this brief, Levin Simes produced seven additional fact sheets:

a. Jane Doe LS 90

b. Jane Doe LS 419

c. Jane Doe LS 128

d. Jane Doe LS 469

e. Jane Doe LS 289

f. Jane Doe LS 267

g. Jane Doe LS 327

7. Further, three of the Plaintiffs subject to Uber's motion are currently incarcerated, and one Plaintiff is deceased.

8. Uber brought a similar request in the JCCP before Judge Schulman. Judge Schulman

1 denied the request because the cases were stayed, and bellwethers were already selected.

2 I declare under penalty of perjury under the laws of the United States of America that the
3 foregoing is true and correct. Executed on May 30, 2025, in San Francisco, California.

4 Respectfully Submitted,

5 /s/ William A. Levin

6 William A. Levin

7 Attorney for LS Plaintiffs
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ William A. Levin
William A. Levin

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax